

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

IN RE: ALLURA FIBER CEMENT SIDING  
PRODUCTS LIABILITY LITIGATION

2:19-mn-02886-DCN

This Document Relates to:

ANTONETTA LUONGO, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

ALLURA USA LLC, PLYCEM USA LLC  
D/B/A ALLURA, PLYCEM USA, INC.,  
ELEMENTIA USA, INC., ELEMENTIA,  
S.A. DE C.V.,

Defendants.

Case No. 2:19-cv-01168-DCN

Judge: David C. Norton

This Document Relates to:

JACOB W. JUVLAND, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

ALLURA USA LLC, PLYCEM USA LLC  
D/B/A ALLURA, PLYCEM USA, INC.,  
ELEMENTIA USA, INC., ELEMENTIA,  
S.A. DE C.V.,

Defendants.

Case No. 2:19-cv-01052-DCN

Judge: David C. Norton

**CONSENT MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND  
TO THE COMPLAINTS**

Defendants Plycem USA LLC and Elementia USA Inc. (the “Moving Defendants”)<sup>1</sup> hereby move for an extension of time to answer or otherwise respond to the Complaints filed in the two above-captioned cases. Motions to Dismiss in three separate cases in this Multidistrict Litigation were previously fully briefed, but this Court in its Order of April 29, 2019, denied those pending motions without prejudice, and with leave to refile once Lead Counsel is appointed. Consistent with the spirit of that Order, the Moving Defendants believe briefing in the two above-captioned cases should be delayed until Lead Counsel is appointed. The Moving Defendants have consulted with Plaintiffs’ counsel in both cases, and they have no objection.

For the foregoing reasons, the Moving Defendants ask that the deadline to answer or otherwise respond to the Complaints be extended until after such time as Lead Counsel is appointed.

Respectfully submitted,

By: /s/ Leah Greenberg Katz

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<sup>1</sup> The captions also list three additional defendants: Allura USA LLC, Plycem USA, Inc., and Elementia S.A.B. de C.V. Neither of the first two defendants exists as an independent corporate entity. Allura is merely a trade name of Plycem USA LLC. Plycem USA, Inc. merged into Plycem USA LLC and no longer maintains any independent corporate existence. Accordingly, these non-existent entities are not properly named and should be stricken from the caption. Finally, Elementia S.A.B. de C.V. is a company based in Mexico. Even if this Court could properly assert personal jurisdiction over it, Plaintiffs have failed to effectuate service of process on it. Elementia S.A.B. de C.V. does not consent to this Court’s jurisdiction, and will only respond to the Complaint if this Court finds it has jurisdiction, and it is served pursuant to the Federal Rules of Civil Procedure and relevant federal and international laws.

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*Attorneys for Defendants*

May 1, 2019  
Charleston, South Carolina

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon the following via the Court's electronic filing system this 1st day of May, 2019.

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/s/ Leah Greenberg Katz  
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